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10 *Attorneys for Robert Bosch LLC*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 ROBERT BOSCH LLC,

15 Plaintiff,

16 v.

17 COREA AUTOPARTS PRODUCING  
18 CORPORATION, and CAP AMERICA,

19 Defendants.

Case No. 2:10-cv-1924

**COMPLAINT**

[JURY TRIAL DEMANDED]

20 Plaintiff Robert Bosch LLC (“Bosch”), through its attorneys, for its complaint against  
21 Defendant Corea Autoparts Producing Corporation and Defendant CAP America (collectively,  
22 “Defendants”), avers as follows:

23 1. This action arises under the patent laws of the United States, Title 35 of the  
24 United States Code (for example, 35 U.S.C. §§ 271, 281, 283, 284, and 285) as hereinafter more  
25 fully appears. This Court has jurisdiction over the subject matter of the action pursuant to 28  
26 U.S.C. §§ 1331 and 1338.  
27

1           2.       On April 29, 2003, United States Letters Patent No. 6,553,607 (attached as  
2 Exhibit A) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
3 of those Letters Patent.

4           3.       Defendants have infringed and still are infringing those Letters Patent directly and  
5 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
6 patented invention, such as the CF4 and MA1 wiper blade products, and will continue to do so  
7 unless enjoined by this Court.

8           4.       On January 13, 2004, United States Letters Patent No. 6,675,434 (attached as  
9 Exhibit B) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
10 of those Letters Patent.

11           5.       Defendants have infringed and still are infringing those Letters Patent directly and  
12 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
13 patented invention, such as the CF4 and MA1 wiper blade products, and will continue to do so  
14 unless enjoined by this Court.

15           6.       On January 4, 2005, United States Letters Patent No. 6,836,926 (attached as  
16 Exhibit C) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
17 of those Letters Patent.

18           7.       Defendants have infringed and still are infringing those Letters Patent directly and  
19 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
20 patented invention, such as the CF4 and MA1 wiper blade products, and will continue to do so  
21 unless enjoined by this Court.

22           8.       On September 20, 2005, United States Letters Patent No. 6,944,905 (attached as  
23 Exhibit D) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
24 of those Letters Patent.

1           9. Defendants have infringed and still are infringing those Letters Patent directly and  
2 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
3 patented invention, such as the CF4 and MA1 wiper blade products, and will continue to do so  
4 unless enjoined by this Court.

5           10. On December 13, 2005, United States Letters Patent No. 6,973,698 (attached as  
6 Exhibit E) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
7 of those Letters Patent.  
8

9           11. Defendants have infringed and still are infringing those Letters Patent directly and  
10 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
11 patented invention, such as the CF4 and MA1 wiper blade products, and will continue to do so  
12 unless enjoined by this Court.  
13

14           12. On November 13, 2007, United States Letters Patent No. 7,293,321 (attached as  
15 Exhibit F) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
16 of those Letters Patent.

17           13. Defendants have infringed and still are infringing those Letters Patent directly and  
18 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
19 patented invention, such as the CF4 wiper blade products, and will continue to do so unless  
20 enjoined by this Court.  
21

22           14. On April 28, 2009, United States Letters Patent No. 7,523,520 (attached as  
23 Exhibit G) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner  
24 of those Letters Patent.

25           15. Defendants have infringed and still are infringing those Letters Patent directly and  
26 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the  
27

1 patented invention, such as the CF4 wiper blade products, and will continue to do so unless  
2 enjoined by this Court.

3 16. Defendants' infringement has caused and will continue to cause damage and  
4 irreparable harm to Bosch until enjoined by this Court.

5 WHEREFORE, Plaintiff demands an injunction against continued infringement, an  
6 award of damages, an assessment of interest and costs against Defendants, and such other relief  
7 as the Court may find just and proper.  
8

9 **JURY DEMAND**

10 Plaintiff demands a trial by jury.

11 LIONEL SAWYER & COLLINS

12  
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